

# **EXHIBIT 13**

HIGHLY CONFIDENTIAL - Carrie Griffiths

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

\_\_\_\_\_  
)  
) Civil Action No.  
) 5:16-cv-10444-JEL-MKM  
In re: FLINT WATER CASES ) (consolidated)  
)  
) Hon. Judith E. Levy  
) Mag. Mona K. Majzoub  
\_\_\_\_\_)

HIGHLY CONFIDENTIAL  
Wednesday, November 16, 2022

Remote videotaped deposition of  
CARRIE GRIFFITHS, held at the location of the witness  
in Boston, Massachusetts, commencing at 9:09 a.m., on  
the above date before Carol A. Kirk, Registered Merit  
Reporter, Certified Shorthand Reporter, and Notary  
Public.

GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
deps@golkow.com

1 correct?

2 MR. KRAMER: Objection.

3 A. I don't know. I would assume  
4 that.

5 Q. Well, who would know? Who at  
6 Veolia would know exactly who was responsible  
7 for the tweets that were being generated during  
8 the first bellwether trial from the Veolia  
9 Twitter account?

10 A. I would assume that's  
11 Pierre Farcot.

12 Q. Pierre Farcot. Why would you  
13 assume that it's him?

14 A. My understanding is that Pierre  
15 was the point person for the communications  
16 related to the trial.

17 Q. Does that include -- strike that.

18 Are you aware of the website  
19 veoliaflintfacts.com?

20 A. I am.

21 Q. And that website was created prior  
22 to you joining any Veolia entity in 2018,  
23 correct?

24 A. Correct.

1 Q. Do you understand that during  
2 trial, the content of veoliaflintfacts.com  
3 changed and had additions to it from prior to  
4 the trial beginning?

5 MR. KRAMER: Objection.

6 A. That may be. I wasn't looking at  
7 it closely during that time.

8 Q. Irrespective of whether you saw it  
9 or not, are you aware that content was added to  
10 that website during the first Flint bellwether  
11 trial?

12 A. I'm not sure.

13 Q. Who would be responsible for  
14 adding content to the veoliaflintfacts.com  
15 website today?

16 A. I'm assuming that would be Pierre.

17 Q. Who would have been responsible  
18 for adding content to the Veolia Flint Facts  
19 website during the first bellwether trial?

20 A. Didn't I just answer that? Isn't  
21 that the question you just asked?

22 Q. It's not. But is it the same  
23 answer?

24 I asked you who would be

1 responsible today, and then I asked you who  
2 would have been responsible during the trial.

3 MR. KRAMER: I don't think --

4 Q. So let me ask it -- let me strike  
5 all that and start over.

6 Sitting here today on November 16,  
7 2022, who was responsible amongst all the Veolia  
8 entities with any content that's added to the  
9 veoliaflintfacts.com website?

10 A. It would be Pierre, but I believe  
11 he's not with the company anymore. I'm not sure  
12 who it is right now.

13 Q. Okay. We'll get to Pierre in a  
14 minute.

15 During the trial, during the first  
16 Flint bellwether trial, who would have been  
17 responsible for the content additions associated  
18 with the veoliaflintfacts.com website?

19 A. I assume that's Pierre.

20 Q. Okay. Prior to the first  
21 bellwether trial, who would have been  
22 responsible for additions of content to the  
23 veoliaflintfacts.com website?

24 A. Pierre.